



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

September 15, 2015

BY ECF

Hon. Edgardo Ramos
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States of America et al. ex rel. Kane v. Healthfirst, Inc., et al.*,
11 Civ. 2325 (ER)

Dear Judge Ramos:

We write respectfully on behalf all parties to the above-referenced action to request that the Court refer this matter to the assigned magistrate judge, Judge Fox, for purposes of setting a settlement conference. After the Court inquired at our recent conference, the parties have discussed further and believe that it is in their best interests to explore settlement before engaging in discovery. With this concern in mind, the parties further respectfully request that the Court stay all pending discovery deadlines until the completion of the settlement process. The parties additionally propose that they send a joint status letter promptly after completion of their settlement discussions indicating whether a settlement has been reached. If the parties are unable to settle the case, they would submit a proposed revised discovery schedule for the court's consideration.

We thank the Court for its consideration of this request.

Respectfully,

PREET BHARARA
United States Attorney

By: s/Jean-David Barnea
JEAN-DAVID BARNEA
JACOB BERGMAN
Assistant United States Attorneys
Telephone: (212) 637-2679/2776
Email: Jean-David.Barnea@usdoj.gov
Jacob.Bergman@usdoj.gov

Cc: All parties (by ECF)